

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 19-cv-08655 (JHR)

**NOTICE OF PLAINTIFF'S MOTION FOR INSTATEMENT,
PERMANENT INJUNCTION, AND OTHER POST JUDGMENT RELIEF**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Declarations of Nora Ostrofe and Gregory S. Chiarello, and Exhibits attached thereto, Plaintiff Ulku Rowe shall move this Court for the following relief (1) instatement of Plaintiff to Level 9, (2) instatement of Plaintiff to the VPFS-Sales or an equivalent position, or if instatement is infeasible, an award of front pay damages, (3) declaration that Google has violated the NYLL and NYCHRL and a permanent injunction enjoining it from future discrimination and retaliation against Plaintiff, (4) an award of monetary relief to offset tax consequences to Plaintiff, and (5) an award of pre- and post-judgment interest.

Dated: November 22, 2023
New York, New York

Respectfully submitted,
By: /s/ Cara E. Greene
Cara E. Greene
Gregory S. Chiarello
Shira Z. Gelfand
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
ceg@outtengolden.com
gchiarello@outtengolden.com
sgelfand@outtengolden.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, November 22, 2023, I filed the foregoing document using the Court's CM/ECF filing system, which will automatically send e-mail notification of such filing to the following individuals of record:

Kenneth W. Gage
Sara B. Tomezsko
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
kennethgage@paulhastings.com
saratomezsko@paulhastings.com

Attorneys for Defendant

/s/ Cara E. Greene
Cara E. Greene